

ADMINISTRATIVE RECORD


1076556 - R8 SDMS

Option 1

Status Quo: Continue to do Removals, Complete a BRA with all the studies identified in the Libby Action Plan

Advantages: Gets us the best data we need to determine what's safe/what's not. The uncertainties would be reduced.

Disadvantages: Could possibly be delayed by up to two years. May not get the information we need since other offices are in the lead in the studies that are planned.

Community/Political Support: Right now there is support since the community/politicians believe that this is the plan we are following. However, there would be some anger about the delays since it won't get us to a ROD in the timeframe we most recently told them.

Option 2

Interim ROD??

Option 3

Complete a quantitative BRA without the animal study data. The BRA would still have the non-cancer information based on the University of Cincinnati Study and the exposure data.

Advantages: Can get us to a BRA & ROD sooner than the original plan. Would be able to collect the data we need to continue to move forward.

Disadvantages: May not get us all the data to make the best decision. The uncertainties may be greater.

Community/Political Support: Would have to do some additional education with the community to make sure they are supportive of the change in the original plan.